

JOSE DUCHWALD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

07 CV 6876

x Index No.:

NEW YEAR'S NATION, LLC,

Plaintiff,

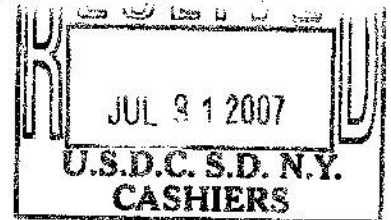
-against-

E-TICKETS SOFTWARE, INC. &
AARON L. MORTENSEN,

Defendants.

COMPLAINT

JURY TRIAL
DEMANDED



Plaintiff NEW YEAR'S NATION, LLC, by its attorney, EDWARD C. GREENBERG, P.C., as and for his complaint against the Defendants E-TICKETS SOFTWARE, INC. and AARON L. MORTENSEN, alleges as follows:

1. Plaintiff, NEW YEAR'S NATION, LLC, (hereinafter "NATION") is a New York domestic limited liability company, incorporated on October 11, 2006, with its principal place of business located at 297 West 12th Street, Suite 3A, New York, NY 10014.

2. NATION's principal business purpose is the organization, staging, and promotion of large-scale New Year's Eve events in major cities across the United States. NATION's New Year's Eve event is unique in that each venue features simultaneous webcasts from its event venues in other cities. The result is that each city is linked to the next in one large celebration. NATION's events include entertainment, food, and beverage.

3. The principal and Chief Executive Officer of NATION is one JANN YOGMAN (hereinafter "YOGMAN"). YOGMAN is a resident of the State of New York, County of New York.

4. Defendant, E-TICKETS SOFTWARE, INC. (hereinafter "E-TICKETS"), is a California